

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY LLC, <i>et al.</i>, Debtors.¹	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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ANKOR ENTITIES' OBJECTION TO DEBTORS' NOTICE CURE AMOUNTS
[Related Docket No. 1395]

Ankor Energy LLC and Ankor E&P Holdings LLC (collectively, "Ankor") hereby file this Objection to Debtors' notice of cure amounts (the "Cure Notice") (Docket No. 1395) and states as follows:

BACKGROUND

1. Ankor and Fieldwood Energy LLC ("Fieldwood") are parties to that certain Offshore Operating Agreement dated effective July 1, 1975 (the "PL 13 OOA") by which Ankor, as operator of Lease OCS-G 03171, South Pelto Area Block 13 ("PL 13"), on behalf of Fieldwood and other co-working interest owners.

2. The PL OOA provides the terms by which Ankor incurs expenses for PL 13 operations on behalf of Fieldwood (and others) and the means by which Fieldwood (and others) are to reimburse Ankor for each entity's share of such expenses.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

3. Pursuant to the terms of the PL 13 OOA, Ankor is owed **\$554,449.36** from Fieldwood for unpaid joint interest billings associated with operations on PL 13 and governed by the PL 13 OOA.²

OBJECTIONS

Ankor objects to the Cure Notice as follows:

4. With respect to the PL 13 OOA, Debtors have identified a \$0.00 cure amount. For the reasons set forth above, the proper cure amount in order Fieldwood to assume the PL 13 OOA is **\$554,449.36**, to cover costs owed by Fieldwood relating to operations by Ankor on the PL 13 Field, pursuant to the terms of the SS 189 OOA.

RESERVATION OF RIGHTS

5. Ankor expressly reserves its rights with respect to the Cure Notice and any amendments to same, adequate assurance of the future performance, Debtors' Plan and Restructuring Transaction, and all rights with respect to any claim it may assert in this case.

Dated: June 7, 2021

Respectfully submitted,

JOHNSON DELUCA KURISKY & GOULD
A Professional Corporation

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² This \$554,449.36 is the same amount as included in the Proofs of Claim filed by Ankor, with attachments and additional explanation, all as incorporated herein by reference.

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June, 2021 a true and correct copy of the foregoing document was served via this Court's CM/ECF system on all parties having consented to such electronic service in this case.

/s/ Millard A. Johnson

Millard A. Johnson